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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

CASE NO.] : 19 CR 283
MAGISTRATE WILLIAM H. BAUGHMAN, JR.
MOTION TO SEAL INDICTMENT

Now comes the United States of America, by and through counsel, Justin E. Herdman, United States Attorney, and Scott Zarzycki, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): Defendant's present whereabouts are unknown and he is believed to be a flight risk.

Accordingly, the indictment should be sealed until Defendant is arrested.

The government further requests this Court to order that an Assistant United

States Attorney of the Criminal Division of the United States Attorney's Office for the Northern

District of Ohio may obtain, upon request, a certified copy of this indictment should the

defendant be located in another judicial district and a certified copy of this indictment is needed

for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

JUSTIN E. HERDMAN United States Attorney

By: /s/ Scott Zarzycki

Scott Zarzycki (OH: 0072609) Assistant United States Attorney

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